Hughes Hubbard & Reed Hughes Hubbard & Reed LLP
One Battery Park Plaza
New York, New York 10004-1482
Office:+1 (212) 837-6000
Fax: +1 (212) 422-4726
hugheshubbard.com

Marc A. Weinstein
Partner
Direct Dial: +1 (212) 837-6460
Direct Fax: +1 (212) 299-6460
marc.weinstein@hugheshubbard.com

MEMO ENDORSED

May 8, 2023

VIA EMAIL & ECF

Honorable Edgardo Ramos United States District Judge Southern District of New York 40 Foley Square New York, New York 10007 Mr. Armenta's application for modification of his bail conditions to permit travel between Florida and California between May 8, 2023 and May 30 is granted.

SO ORDERED.

Edgardo Ramos, U.S.D.J. Dated: 5/9/2023

New York, New York

Re: *United States v. Gilbert Armenta*, 17 Cr. 556 (ER)

Dear Judge Ramos:

On behalf of Gilbert Armenta, we respectfully submit this corrected request seeking a modification of Mr. Armenta's bail conditions to permit Mr. Armenta to travel between Florida and California on multiple occasions between May 8 and May 30, 2023 to attend to his mother, with a requirement that he provide the Government and Probation with each round trip itinerary in advance of any out-of-state travel, and that Probation would need to approve each proposed trip. Subject to these conditions, the United States Attorney's Office for the Southern District of New York consents to this request.

On May 1, the Court granted Mr. Armenta's application to postpone his surrender date from May 1 until May 31, 2023 so that he may attend to his mother and arrange home care and potentially hospice care for her future in light of her rapidly deteriorating health. (ECF 84.) Mr. Armenta's mother is currently in a rehab facility and thereafter will need to be admitted to an assisted living facility. With the court's permission, Mr. Armenta intends to travel to California on May 10 to assist with this process, and expects he will need to return to California during the month of May to continue assisting his mother.

Mr. Armenta thanks the Court for its consideration of this request.

On May 4, we submitted a substantially similar request, which the Court granted today. (ECF 85-86.) This application has been corrected to reflect that Mr. Armenta will be traveling from Florida, where he resides, rather than New York. Additionally, this application includes in the second paragraph Mr. Armenta's updated date of planned departure, May 10.

Respectfully submitted,

/s/ Marc A. Weinstein Marc A. Weinstein

cc: AUSA Christopher DiMase AUSA Nicholas Folly AUSA Juliana Murray AUSA Kevin Mead Senior Probation Officer Garry Hackett